

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD MARCH 24, 2022 THROUGH APRIL 30, 2022**

Debtor: LTL Management LLC

Applicant: Traurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J. Keach, Esq.,  
(the "Fee Examiner")

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

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**SECTION 1  
FEE SUMMARY**

Monthly Fee Application No. 1 or  Final Fee Application

Summary of Amounts Requested for the Period from March 24, 2022 through April 30, 2022 (the "First Statement Period").

Total Fees March 24, 2022 – April 30, 2022:	\$ 4,717.50
Fees March 24, 2022 – March 31, 2022	\$ 2,550.00
Fees April 1, 2022 – April 30, 2022	\$ 2,167.50
Total Disbursements:	\$ 0.00
Total Fees Plus Disbursements:	\$ 4,717.50
Minus 20% Holdback of Fees:	\$ 943.50
Amount Sought at this Time:	\$ 3,774.00

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	\$0.00	\$0.00
Total Fees Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00	\$0.00
Total Holdback (If Applicable):	\$0.00	\$0.00
Total Received by Applicant:	\$0.00	\$0.00

**COMPENSATION BY: PROFESSIONAL  
MARCH 24, 2022 THROUGH APRIL 30, 2022**

The attorney(s) who rendered professional services in these chapter 11 cases from March 24, 2022 through March 31, 2022 (the "Fee Period") are:

Name of Professional: Partner/Member	Year Admitted	Hourly Rate	Total Hours Billed	Total Fees
Jeffrey Traurig	1997	\$425.00	6.0	\$ 2,550.00

The attorney(s) who rendered professional services in these chapter 11 cases from April 1, 2022 through April 30, 2022 (the "Fee Period") are:

Name of Professional: Partner/Member	Year Admitted	Hourly Rate	Total Hours Billed	Total Fees
Jeffrey Traurig	1997	\$425.00	5.1	\$2,167.50

The total fees for the Fee Period March 24 through April 30, 2022 are:

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partner/Member:	\$425.00	11.1	\$ 4,717.50
<b>Blended Attorney Rate:</b>	\$425.00	11.1	\$ 4,717.50
<b>Blended Rate for All Timekeepers:</b>	\$425.00	11.1	\$ 4,717.50
<b>Total Fees Incurred:</b>			<b>\$ 4,717.50</b>

**SECTION II  
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED BY  
TRAURIG LAW LLC**

**FOR THE PERIOD MARCH 24, 2022 THROUGH MARCH 31, 2022**

DESCRIPTION	HOURS	AMOUNT
Employment and Fee Applications	6.0	\$2,550.00
<b>Total Fees Requested For March 24, 2022- March 31, 2022</b>	6.0	<b>\$ 2,550.00</b>

**FOR THE PERIOD APRIL 1, 2022 THROUGH APRIL 30, 2022**

DESCRIPTION	HOURS	AMOUNT
Case Administration/General	.6	\$ 255.00
Employment and Fee Applications	4.4	\$1,870.00
Employment and Fee Reports/Objections	.1	\$ 42.50
<b>Total Fees Requested for April 1, 2022 – April 30, 2022</b>	5.1	<b>\$ 2,167.50</b>

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY TRAURIG LAW LLC**  
**FOR THE PERIOD MARCH 24, 2022 THROUGH APRIL 30, 2022**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
N/A	--
<b>DISBURSEMENTS TOTALS</b>	<b>\$0.00</b>

## SECTION IV CASE HISTORY

(1) Date cases filed:	October 14, 2021
(2) Chapter under which case commenced:	Chapter 11
(3) Date of retention order:	April 5, 2022 [Dkt. 1966] (the “Retention Order”) <sup>3</sup> .
(4) Summarize in brief the benefits to the estate and attach supplements as needed	SEE BELOW

During the First Statement Period, Traurig Law LLC (“Traurig Law”) provided the following services to Robert J. Keach, the Fee Examiner, including, but not limited to, the following:

*Case Administration/General*

- Prepare and file notice of appearance.

*Employment and Fee Applications*

- Draft, review and file employment retention applications, declarations and associated exhibits for Traurig Law and Bernstein, Shur, Sawyer & Nelson, P.A. (“BSSN”).
- Review and file *pro hac vice* applications, certifications and proposed orders for Fee Examiner and counsel at BSSN.
- Coordinate with BSSN regarding service of fee application, and *pro hac vice* filings, and file certificate of service.

*Employment and Fee Reports/Objections*

Review docket filings and coordinate with BSSN regarding obtaining filings.

<sup>3</sup> The Retention Order is attached hereto as Exhibit A. Retained professionals may seek compensation for actual and necessary services rendered prior to the date of the court’s approval of such retention. See *In re Mallinckrodt PLC*, No. BR 20-12522-JTD, 2022 WL 906451, at \*8 (D. Del. Mar. 28, 2022); *In re Benitez*, No. 8-19-70230-reg, 2020 WL 1272258, at \*2-5 (Bankr. E.D.N.Y. Mar. 13, 2020).

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this
(b) Secured creditors:	Unknown at this
(c) Priority creditors:	Unknown at this
(d) General unsecured creditors:	Unknown at this

(6) Final disposition of case and percentage  
of dividend paid to creditors

Final dividend percentages are unknown  
at this time.

I certify under penalty of perjury that the above is true.

Date: May 25, 2022

/s/ Jeffrey Traurig

Jeffrey Traurig

**EXHIBIT A**

Retention Order



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jeffrey Traurig  
**TRAURIG LAW LLC**  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: [jtraurig@trauriglaw.com](mailto:jtraurig@trauriglaw.com)  
*Proposed Local Counsel to the Fee Examiner*

Order Filed on April 5, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:  
  
LTL MANAGEMENT LLC,  
  
Debtor

Case No.: 21-30589 (MBK)  
  
Judge: Michael B. Kaplan  
  
Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC  
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby ORDERED.

**DATED: April 5, 2022**

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Traurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC  
One University Plaza, Suite 124  
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."
3. If the professional requested a waiver as noted below, it is  Granted  Denied.
  - Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.
  - Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

**EXHIBIT B**

Invoice

Traurig Law LLC

One University Plaza, Ste 124  
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22021

Date	May 17, 2022
Terms	Court Order
Service Thru	Apr 30, 2022

**In Reference To: LTL Management LLC (Fees)**

Date	By	Services	Rate	Hours	Amount
<b>Case Administration/General</b>					
04/01/2022	JT	Drafting /finalizing Notice of Appearance for Traurig Law (.5); file notice of appearance (.1).	\$ 425.00	0.60	\$ 255.00
<b>Case Administration/General Total:</b>					
				<b>0.60</b>	<b>\$255.00</b>
<b>Employment and Fee Applications</b>					
03/24/2022	JT	Call with B. Keach re appointment as fee examiner, retention application and disclosures, coordination of preparing same for BSSN and Traurig Law.	\$ 425.00	0.30	\$ 127.50
03/25/2022	JT	Begin drafting declaration in support of retention for Traurig Law (.5).	\$ 425.00	0.50	\$ 212.50
03/28/2022	JT	Drafting declaration in support of retention, including inserts and sections to be included in retention application for Traurig Law (2.1); further review entity names of prior connections and notice of appearances for disclosure for Traurig Law retention (.7); email to B. Keach re disclosures and declarations of Traurig Law and additional notice party for review (.1); review docket and email to B. Keach re retention applications of professionals, including local rule form issues (.2).	\$ 425.00	3.10	\$ 1,317.50
03/30/2022	JT	Call with and coordinate with L. Boots re preparing retention applications for Traurig Law and BSSN and inclusion of Traurig Law declaration, preparation of Pro Hac papers for BSSN, service issues and case management order (.2); preliminary review of retention applications for BSSN and Traurig Law and call with L. Boots on same (.2).	\$ 425.00	0.40	\$ 170.00

Traurig Law LLC

One University Plaza, Ste 124  
Hackensack, NJ 07601

# INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22021

Date	May 17, 2022
Terms	Court Order
Service Thru	Apr 30, 2022

03/31/2022 JT	Review and comment on BSSN retention application, disclosure certification and proposed order (.3); review Traurig Law retention application, revised certification disclosure and proposed retention order (.5); review Pro Hac applications and provide additional comments to certifications and orders for B. Keach, L. Boots and L Milne (.4); review local rules re pro hac orders and retention form of orders for Traurig Law and BSSN (.2); call with L. Boots re revisions/comments for retention applications and Pro Hac papers (.2); emails with L. Boots re filing/finalizing status, additional comments to revised orders and regarding Notice of Appearance issues (.1).	\$ 425.00	1.70	\$ 722.50
04/01/2022 JT	Further review declaration, application, orders, exhibits for BSSN retention papers (.2); further review declaration, application, orders, exhibits for Traurig Law retention papers (.2); call with L. Boots on coordinating final revisions to BSSN and Traurig Law retention documents (.3); review case management order, master service list from Epiq and forms for certification of service in connection with preparing service lists, and email to K. Quirk re same (.4); and call with K. Quirk coordinating service and master service list (.2); review revised Pro Hac papers (.2); further call with L. Boots re revising and finalizing pro hac, retention and NOA papers (.5); reviewing and finalizing retention applications, exhibits, certification for BSSN (.3); reviewing and finalizing retention applications, exhibits, certification for Traurig Law (.3); reviewing/finalizing Pro Hac certification, and order for filing for B. Keach, L. Milne and L. Boots (.5); filing retention applications for Traurig Law (with exhibits) (.3), BSSN (.2), Pro Hac papers for B. Keach, L. Milne and L. Boots (.2).	\$ 425.00	3.80	\$ 1,615.00

Trauring Law LLC

One University Plaza, Ste 124  
Hackensack, NJ 07601

# INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22021

Date	May 17, 2022
Terms	Court Order
Service Thru	Apr 30, 2022

04/04/2022 JT	Review email and call with K. Quirk re UST response/request and proposed modification to retention order, emails with B. Keach on same, email and call with L. Boots re revisions to proposed order and coordination re submission of same (.2); review certification of service re 4/1 filings, emails with K. Quirk on same, review revisions (.1); file certificates of service re 4/1/ pleadings (.1);	\$ 425.00	0.40	\$ 170.00
04/11/2022 JT	Review entered Pro Hac orders, email to B. Keach and L. Boots on same, obtain NJ Client info detail and email to L. Boots regarding coordinating compliance/payment (.2).	\$ 425.00	0.20	\$ 85.00

**Employment and Fee Applications Total:** **10.40** **\$4,420.00**

#### Employment and Fee Reports/Objections

04/04/2022 JT	Review docket filings and email to L. Boots re Patterson fee application and general coordination status for obtaining fee application filings (.1).	\$ 425.00	0.10	\$ 42.50
			<b>Employment and Fee Reports/Objections Total:</b>	<b>0.10</b> <b>\$42.50</b>
			<b>Total Fees Amount:</b>	<b>11.10</b> <b>\$4,717.50</b>

<b>Total Hours</b>	11.10 hrs
<b>Total Fees</b>	\$ 4,717.50
<b>Total Invoice Amount</b>	\$ 4,717.50
<b>Previous Balance</b>	\$ 0.00
<b>Balance (Amount Due)</b>	<b>\$ 4,717.50</b>